

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

*v.*

\$172,200.75 SEIZED FROM REGIONS BANK  
ACCOUNT ENDING 1908,

DEFENDANT.

Civil Action No.

**VERIFIED COMPLAINT FOR FORFEITURE**

NOW COMES Plaintiff United States of America, by Ryan K. Buchanan, United States Attorney, and Norman L. Barnett, Assistant United States Attorney, for the Northern District of Georgia, and shows the Court the following in support of its Verified Complaint for Forfeiture:

**NATURE OF THE ACTION**

1. The defendant property consists of \$172,200.75 in funds that the United States Secret Service (“USSS”) seized, pursuant to a Federal seizure warrant on or about August 3, 2022 from Regions Bank account ending 1908 (“Defendant Property”), as proceeds of a fake invoicing scheme.

**JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction over this action pursuant to

28 U.S.C. §§ 1345 and 1355.

3. This Court has in rem jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

4. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because the acts or omissions giving rise to the forfeiture occurred in this district.

5. The Defendant Property is presently being held in a government account maintained by the USSS.

## **BASIS FOR FORFEITURE**

### **Relevant Statutes**

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) on the grounds that it constitutes or was derived from proceeds traceable to violations of 18 U.S.C. §§ 1349 (conspiracy to commit wire fraud) and 1343 (wire fraud).

7. The Defendant Property is also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) on the grounds that it constitutes property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957 (money laundering), or is property traceable to such property.

### **Factual Background**

#### *The Wire Fraud Scheme Targeting Amazon*

8. Amazon.com, Inc. (“Amazon”) is an American multinational technology company which focuses on e-commerce, cloud computing, digital streaming, and artificial intelligence. Amazon headquarters are located in Seattle, Washington and Arlington, Virginia.

9. On or about June 10, 2022, the USSS began investigating a multi-level embezzlement scheme involving an unusually large and significant flow of funds between several accounts, including Regions Bank account ending 1908 (“Target Account”), in the form of transfers, ACH credits and debits, and large dollar wires involving payments from Amazon that took place from January 2022 through June 2022.

10. A review of bank records from several financial institutions revealed that Amazon sent substantial Electronic Data Interchange (“EDI”) payments to various bank accounts, including the Target Account. EDI is the computer-to-computer exchange of business documents in a standard electronic format, oftentimes between business partners.

11. During the investigation, USSS determined that Kayricka Wortham (“Wortham”) was an Operations Manager at an Amazon Warehouse in Smyrna,

Georgia during the relevant time period.

12. Wortham supervised others and had the authority to approve vendors that provided goods and services for Amazon.

13. Wortham also had the authority to approve the payment of vendor invoices.

14. USSS determined that, from approximately January 2022 through June 2022, Wortham and her co-conspirators created fake vendors and submitted more than \$10 million in fictitious invoices for those vendors.

15. The fraudulent invoices submitted by Wortham and her co-conspirators caused Amazon to transfer approximately \$9.4 million to bank accounts controlled by Wortham and her co-conspirators.

16. USSS further determined that Jamar L. James, Sr. ("James") was an Amazon employee during the relevant time period.

17. James began working at Amazon on or about October 5, 2020 as a Delivery Operations Manager. He spent most of his employment with Amazon in this role at the Amazon Delivery Station at 4000 Venture Drive, Duluth, Georgia 30096.

18. In or around August of 2022, James transferred to the Amazon Delivery Station at 7600 Crestwood Boulevard, Birmingham, Alabama, 35210.

19. James, like Wortham, had the authority to approve Amazon's vendors.

20. Wortham stopped working at Amazon in or about March 2022.

21. Following Wortham's departure, James approved fictitious vendors and invoices to perpetuate the fake vendor scheme.

22. Specifically, during the relevant time period, James approved approximately 26 fake vendors and approximately 465 fraudulent invoices for payment.

23. The co-conspirators, including James, continued to receive fraudulent proceeds from the wire fraud scheme until approximately June 2022.

*The Target Account Received Fraud Proceeds Embezzled from Amazon*

24. The investigation revealed that the Target Account is held in the name of J. James. James and his wife, A.T., are the signers on the account.

25. During its investigation, USSS determined that the Target Account received fraudulent proceeds from the fake invoicing scheme in or around April 2022 and May 2022.

26. On August 3, 2022, USSS obtained a federal seizure warrant for funds

maintained in the Target Account and seized the Defendant Property.<sup>1</sup>

27. USSS ultimately determined that, prior to the seizure of the Defendant Property, the Target Account received at least \$274,792.26 from the fake invoicing scheme.

28. Specifically, USSS determined that based upon the approval of fake invoices, Amazon made the following EDI payments to the Target Account:

| Date      | Transaction  |
|-----------|--|
| 4/29/2022 | Transfer in the amount of \$9,408.96 from Amazon to Target Account   |
| 5/11/2022 | Transfer in the amount of \$195,878.15 from Amazon to Target Account |
| 5/26/2022 | Transfer in the amount of \$31,593.25 from Amazon to Target Account  |
| 5/27/2022 | Transfer in the amount of \$37,911.90 from Amazon to Target Account  |

*The United States Brought Criminal Charges Against James and His Co-Conspirators for their Offense Conduct Involving the Wire Fraud Scheme Targeting Amazon*

29. Wortham and some of the other co-conspirators waived Indictment and pleaded guilty to Criminal Informations relating to the fake invoicing scheme.<sup>2</sup>

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<sup>1</sup> *In the Matter of the Seizure of Any and All Funds Maintained in the Regions Bank Account with Account Number XXXXXX1908*, 1:22-mj-685 (N.D. Ga.).

<sup>2</sup> See *United States v. Wortham*, 1:22-cr-00361-TCB-RDC (N.D. Ga. Nov. 30, 2022) (Doc. 9); *United States v. Hines*, 1:22-cr-00341-TCB-RDC (N.D. Ga. Nov. 30, 2022)

30. On June 20, 2023, the United States obtained a First Superseding Indictment charging James with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 (Count 1), 20 counts of wire fraud, in violation of 18 U.S.C. § 1343 (Counts 26 through 45), and two counts of money laundering, in violation of 18 U.S.C. § 1957 (Counts 46 and 47).<sup>3</sup>

31. The First Superseding Indictment contained a forfeiture provision notifying James that, upon conviction of Counts 1 and 26 through 45 of the First Superseding Indictment, the government would seek forfeiture, pursuant to 18 U.S.C. § 982(a)(2), of any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of said violations, including, but not limited to, a money judgement, which is a sum of money in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Counts 1 and 26 through 45 of the First Superseding Indictment.<sup>4</sup>

32. The First Superseding Indictment also contained a forfeiture provision notifying James that, upon conviction of Counts 46 and 47, of the First Superseding Indictment, the government would seek forfeiture, pursuant to 18

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(Doc. 7); *United States v. Blanchard*, 1:23-cr-00114-TCB-RDC (N.D. Ga. June 27, 2023) (Doc. 11).

<sup>3</sup> See *United States v. James, et al.*, 1:23-cr-00131-TCB-RDC (N.D. Ga. June 20, 2023) (Doc. 28).

<sup>4</sup> (*Id.* at 24-25).

U.S.C. § 982(a)(1), of any property, real or personal, involved in such offense, or any property traceable to such property, including, but not limited to, a money judgement, which is a sum of money in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Counts 45 and 46 of the First Superseding Indictment.<sup>5</sup>

*The United States Dismissed the Criminal Charges as to James  
After Discovering His Death*

33. During its efforts to arrest James based on the charges in the First Superseding Indictment, USSS discovered and confirmed that James died on or about March 14, 2023.

34. Based on the discovery of James' death, on August 14, 2023, the United States moved to dismiss the First Superseding Indictment as to James.<sup>6</sup>

35. The Court granted United States' Motion to Dismiss on August 17, 2023.<sup>7</sup>

**FIRST CLAIM FOR FORFEITURE  
18 U.S.C. § 981(a)(1)(C)**

36. The United States re-alleges and incorporates by reference Paragraphs 1 through 35 of this Complaint as if fully set forth herein.

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<sup>5</sup> (*Id.* at 25).

<sup>6</sup> *James, et al.*, 1:23-cr-00131-TCB-RDC (N.D. Ga Aug. 14, 2023) (Doc. 64).

<sup>7</sup> *James, et al.*, 1:23-cr-00131-TCB-RDC (N.D. Ga Aug. 14, 2023) (Doc. 66).



37. Based on the foregoing, the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) on the grounds that the funds constitute or were derived from proceeds traceable to violations of 18 U.S.C. §§ 1349 (conspiracy to commit wire fraud) and 1343 (wire fraud).

**SECOND CLAIM FOR FORFEITURE**  
**18 U.S.C. § 981(a)(1)(A)**

38. The United States re-alleges and incorporates by reference Paragraphs 1 through 35 of this Complaint as if fully set forth herein.

39. The Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) on the grounds that the funds constitute property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957 (money laundering), or is property traceable to such property.

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**PRAYER FOR RELIEF**

WHEREFORE, the United States prays:

- (1) that the Court forfeit the Defendant Property to the United States of America;
- (2) that the Court award the United States the costs of this action; and
- (3) such other and further relief as the Court deems just and proper.

This 1st day of February 2024.

Respectfully submitted,

RYAN K. BUCHANAN  
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/s/NORMAN L. BARNETT  
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**VERIFICATION OF COMPLAINT FOR FORFEITURE**

I, Matthew Oltman, have read the Complaint for Forfeiture in this action and state that its contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 1st day of February 2024.

*Matthew S. Oltman*

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MATTHEW OLTMAN  
SPECIAL AGENT  
UNITED STATES SECRET SERVICE